

FILED

FEB X 6 2013

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION

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Plaintiff,

v.

A CHICAGO CONVENTION CENTER,
LLC, ANSHOO SETHI, and
INTERCONTINENTAL REGIONAL
CENTER TRUST OF CHICAGO, LLC

**13CV982
JUDGE ST. EVE
MAG. JUDGE ROWLAND**

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Defendants.

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S MOTION TO FILE
PAPERS UNDER SEAL PURSUANT TO FEDERAL RULE OF CIVIL
PROCEDURE 5.2(D) AND LOCAL RULE 5.7**

Plaintiff United States Securities and Exchange Commission (the "SEC") respectfully moves for an order pursuant to Federal Rule of Civil Procedure 5.2(d) and Local Rule 5.7 that all papers submitted on this date be filed under seal and to seal the entire Court file. The SEC makes this motion because public knowledge of this proceeding prior to the initiation of the relief sought in the accompanying papers, could substantially frustrate the purposes of the relief sought, as detailed in the attached Complaint and *Ex Parte* Motion For a Temporary Restraining Order and Other Emergency Relief (including an asset freeze), the supporting Memorandum, and accompanying papers filed contemporaneously herewith. In support of this motion, the SEC states:

1. Due to the special circumstances of this matter, which the SEC will promptly bring to the attention of the judge to whom the case is to be assigned, it is necessary to restrict access to the case at filing; and,

2. The SEC is aware that absent an order extending or setting aside the sealing, the file and its contents will become public on the seventh day following the date of filing.

Dated: February 6, 2013

Respectfully submitted,

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION**



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